



## Reporting on Human Rights Due Diligence

Account of Human Rights Due Diligence for Odfjell SE pursuant to Section 4 and Section 5 of the Norwegian Transparency Act for the period 1 January 2025 to 31 December 2025

This report covers the following entities:

**Odfjell SE**  
**Odfjell Tankers AS**  
**Odfjell Management AS**  
**Odfjell Chemical Tankers AS**

Bergen, May 2026

## 1. Global Shipping

Shipping constitutes a critical component of global logistics and distribution networks, facilitating approximately 90% of all cargo transportation worldwide. As a mode of transportation, shipping is the most efficient and represents the most environmentally sustainable method for transporting large volumes across extensive distances. Without the maritime industry, numerous regions and populations would face significant challenges, including critical shortages of essential goods and supplies.

From an economic perspective, the shipping sector is indispensable. Within the European Union alone, maritime transportation accounts for approximately 80% of all exports and imports by volume and 50% by economic value. The industry's capacity to provide cost-effective transport solutions has contributed significantly to global economic development. Over the past four decades, the volume of seaborne trade has quadrupled, ensuring broader global access to affordable products and thereby enhancing living standards internationally.

The relatively low environmental footprint per tonne of cargo transported underscores shipping's pivotal role as a sustainable choice within the broader transport sector. As technological advancements and innovations continue to emerge, shipping remains integral to connecting global markets, supporting economic activity, and contributing positively to global quality of life.

Nevertheless, despite its essential role in facilitating international trade and economic prosperity, the shipping industry must acknowledge and proactively address the potential adverse impacts on human rights associated with its operations. Challenges such as unsafe working conditions, exploitative labor practices, modern slavery, and exposure of seafarers to conflict zones and security threats pose significant risks that require immediate and sustained attention. The maritime working environment can be harsh, hazardous, and isolated conditions that may exacerbate the risk of exploitation, harassment, and psychological harm.

Our industry is obligated to uphold the highest ethical standards to protect and promote the welfare of maritime workers. This commitment involves strict adherence to international labor and safety regulations, continual improvement of operational standards, and rigorous enforcement of practices that guarantee fair wages, safe working environments, adequate living conditions aboard vessels, and a psychologically safe workplace free from harassment and discrimination.

Through transparency, accountability, and continuous improvement, we strive to mitigate these risks and cultivate a shipping sector characterized not only by economic vitality but also by social responsibility. It is our responsibility to ensure that our industry contributes to global economic prosperity while respecting and protecting the fundamental dignity and rights of every individual involved.

## 2. Odfjell and Our Supply Chain

Throughout our 111-year history, Odfjell has maintained an unwavering commitment to responsible and sustainable business practices. The health, safety, well-being, and fundamental rights of our employees are paramount to our operations and organizational values. Respect for human rights is deeply embedded in our business strategy and corporate culture.

Recognizing the broader implications of our operations, we are equally committed to ensuring the protection and respect of human rights within our supply chain. Odfjell sets forth clear principles and standards, explicitly communicating our expectations to suppliers and business partners to ensure adherence to human rights protections and safe working conditions throughout our operations and value chain.

For more detailed information regarding our business model, value chain, and sustainability practices, please see our Sustainability Statement 2025 – General Disclosures – SBM1, available at [odfjell.com](https://odfjell.com).

### 3. The Odfjell Group – Organization and Area of Operation

The Odfjell Group is a leading global provider of maritime transportation and storage services for chemicals and other specialty bulk liquids. Our operations span the globe, with our fleet calling regularly at more than 300 ports worldwide. The Group maintains a global presence through strategically located offices in Norway, the United States, Singapore, the Philippines, South Korea, Brazil, the United Arab Emirates, South Africa, and China.

At sea, our fleet of advanced chemical tankers annually transports approximately 14 million tonnes of cargo, operating continuously under varying weather conditions. The fleet composition is variable as vessels are sold and new vessels are delivered; we expect the fleet to grow in 2026. Onshore, our dedicated terminal teams in the United States, Belgium, and South Korea manage and operate a combined total of 478 storage tanks, representing a total capacity of 1.3 million cubic meters.

Due to the nature of our operations, particularly the handling and transportation of hazardous cargo, safety, compliance and sustainability are central priorities. Ensuring the highest standards in these areas constitutes not only our responsibility but also our license to operate.

Odfjell SE serves as the ultimate parent entity of the Odfjell Group, encompassing subsidiaries subject to reporting obligations under Section 3(a) of the Norwegian Transparency Act, specifically:

- Odfjell Tankers AS
- Odfjell Management AS
- Odfjell Chemical Tankers AS

The scope of this human rights due diligence reporting covers the above-listed subsidiaries, including identified risks and implemented measures relating to human rights impacts. Other subsidiaries and joint ventures of the Odfjell Group are currently not subject to these reporting obligations.

Odfjell SE is publicly listed on the Oslo Stock Exchange. Additional information about our organizational structure is available at: <https://www.odfjell.com/about/our-organization>.

#### 3.1 Organization and Responsibilities

The Chief Executive Officer (CEO) is ultimately responsible for human rights within the organization. The Chief Sustainability Officer (CSO) is specifically charged with overseeing the development and implementation of strategies, governance frameworks, policies, plans, and reporting processes

related to sustainability and human rights due diligence. The Board of Directors (BoD) supervises and ensures the integration and adherence to human rights principles throughout Odfjell's strategic planning and operational activities.

The role of Chief Compliance Officer is currently held by the CSO. The Chief Compliance Officer reports to both the CEO and the BoD via the Audit Committee (AC). The Chief Compliance Officer is the point of contact for compliance matters and also receives reports through the whistleblower system.

The scope of the Audit Committee (AC) encompasses sustainability issues, including review of integrity risk and human rights impacts. The AC serves as an advisory body to assist the BoD in its supervisory role regarding sustainability and ESG reporting. Committee members possess the requisite knowledge and expertise in sustainability matters.

Odfjell emphasizes organisational engagement through active dialogue with employees and their elected representatives. Our objective is to incorporate employee perspectives, experiences, and insights into organizational practices, thereby fostering sustainable and satisfactory working conditions. We seek to maintain and enhance a trust-based dialogue framework through structured interactions with acknowledged labor unions, working environment committees, and works councils. This engagement of our employees is considered a competitive advantage in a competence dependent industry.

## **4. Guidelines and Routines for Handling of Human Rights Due Diligence**

### **4.1 Guidelines and Policies**

Odfjell has implemented a Corporate Human Rights Policy, a Code of Conduct, Corporate Supplier Conduct Principles (CSCP), and a due diligence process. All such material policies are approved by the Board of Directors and owned by either the CEO or CSO.

Odfjell is committed to respecting and promoting human rights as outlined by the International Bill of Human Rights, comprising the Universal Declaration of Human Rights (1948), the International Covenant on Civil and Political Rights (ICCPR, 1966) with its two optional protocols, and the International Covenant on Economic, Social and Cultural Rights (ICESCR, 1966).

Furthermore, Odfjell endorses and actively supports the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, as well as the International Maritime Organization's Maritime Labour Convention. As a signatory to the United Nations Global Compact since 2011, we remain dedicated to operating sustainably and continuously strive for improvement in alignment with the UN Global Compact's Ten Principles. Additionally, we apply the United Nations Guiding Principles on Business and Human Rights (Chapter II) and the OECD Guidelines for Multinational Enterprises as central frameworks guiding our sustainability strategy. Odfjell is also a signatory to the Neptune Declaration on Seafarers Wellbeing.

### **4.2 Risk Assessment**

Each year, Odfjell reviews our comprehensive Human Rights Impact Assessment (HRIA), resulting in a detailed HRIA matrix. Through this structured assessment, we systematically identify, evaluate, and prioritize inherent and potential adverse impacts on human rights linked to our operations and value chain. This evaluation assesses the severity, likelihood, connection, leverage, and priority of identified impacts, subsequently informing our Human Rights Due Diligence (HRDD) Action Plan to mitigate risks effectively.

In 2025, the HRIA was updated and aligned with our Double Materiality Assessment under the EU Corporate Sustainability Reporting Directive (CSRD) regulations and European Sustainability Reporting Standard (ESRS). No material changes were made to the risk scoring; however, adjustments were made to ensure consistency with evolving regulatory frameworks. Additionally, the Rafto Foundation for Human Rights reviewed our HRIA, and we have incorporated their recommendations in the updated assessment.

We actively monitor our exposure to operations in countries with potentially compromised human rights conditions, using a variety of reputable sources to ensure a robust evaluation of political rights, civil liberties, labor conditions, child labour, and modern slavery risks. In our annual Integrity Update to the Board of Directors, we discuss and review human rights risk levels associated with our international offices, operational locations, frequently visited ports, and key supplier countries.

Our Sustainability Statement 2025 – General Disclosures – SBM2 provides a summary of our stakeholder analysis, reflecting the diverse perspectives and interests of stakeholders as communicated through multiple engagement channels. Our Double Materiality Assessment (DMA) forms a key basis for stakeholder dialogues, shaping our understanding and management of sustainability-related impacts. Details are available in our Sustainability Statement 2025 – General Disclosures – SBM3.

### 4.3 Sustainability Statement – Social

Odfjell has undertaken rigorous assessments addressing climate, nature, and biodiversity-related risks. In 2025, the most significant updates to our ESRS reporting include the addition of ESRS topic E4 Biodiversity and an updated, more stringent interpretation of positive impact, whereby items previously reported as positive have been reassessed and removed where they did not meet the revised threshold. These assessments significantly influence our sustainability strategy and establish the foundation for our climate targets and initiatives.

In conducting our Double Materiality Assessment (DMA), Odfjell identified both positive and negative sustainability impacts. Comprehensive results and details from this assessment, including an in-depth analysis of Impacts, Risks, and Opportunities (IRO), are presented in our Sustainability Statement 2025 – General Disclosures – SBM3. Human rights considerations are embedded across all identified ESG material focus areas and form an integrated part of the ESRS reporting under S1 Own Workforce and S2 Workers in the Value Chain.<sup>1</sup>

Odfjell is a committed participant in the FuturePROOF initiative, a collaborative platform jointly established by the Bergen Chamber of Commerce and Industry and the Rafto Foundation for Human

<sup>1</sup> When referring to chapters like SBM, E1-4, S1-2, G1, we refer to the report on the general disclosures and topical standards reported in the Directors Report - Sustainability Statement 2025, available on Odfjell.com.

Rights and Business. FuturePROOF supports businesses in fulfilling their human rights obligations through capacity-building activities, competence enhancement, and knowledge sharing. In addition, Odfjell maintains a deep collaboration with the Rafto Foundation and the Institute for Human Rights, participating in workshops and presentations that enhance our understanding and application of human rights due diligence principles.

#### 4.4 Incident Reporting

Odfjell has a secure reporting hotline, which is optional and anonymous, enabling employees and external stakeholders to raise concerns regarding human or labor rights violations and risks. The hotline is accessible via our webpage and intranet. We also encourage employees to report any concerns through their line manager.

In 2025, no actual severe incidents related to human or labor rights were reported, either within or outside the reporting system, and no legal actions concerning human or labor rights were initiated against Odfjell. Odfjell has not been involved in providing or enabling a remedy as a result of an adverse impact in 2025.

For further information on cases related to harassment and psychological safety, see Section 6.2 of this report.

#### 4.5 Anti-Corruption

The global nature of the shipping industry, with its complex networks and operations spanning multiple jurisdictions, inherently exposes it to corruption and bribery risks. These unethical practices undermine the integrity of maritime trade and have a profound negative impact on human rights. Corruption in shipping can lead to compromised safety standards, unfair labor practices, and the violation of workers' rights, contributing to a cycle of injustice and exploitation.

Odfjell has a clearly stated zero-tolerance policy on corruption. We have an anti-corruption and integrity framework based on the guidance of the UK Bribery Act and Norwegian anti-corruption regulations. We conduct an annual risk assessment from which we devise an action plan on anti-corruption work for the company.

Odfjell is a Maritime Anti-Corruption Network (MACN) member, and we have implemented and supported the MACN 'Say No' campaigns on all our ships. Through MACN, Odfjell engages in collective actions within the shipping industry to tackle corruption and work for zero corruption in our industry. We also track requests for facilitation globally with mandatory reporting from all port visits.

Odfjell has an Integrity Council that coordinates all actions under the framework from all areas of our business.

#### 4.6 Sustainable Procurement

Sustainable procurement is integral to Odfjell's commitment to responsible business operations. We require suppliers and business partners to adhere to our Corporate Supplier Conduct Principles (CSCP), which explicitly include obligations concerning human and labor rights. Our Human Rights

Due Diligence (HRDD) process is being systematically integrated into our Integrity Due Diligence (IDD) procedures for new suppliers and customers.

Suppliers undergo assessments through a structured combination of prequalification procedures, annual performance reviews, on-site supplier visits, audits, checklists, detailed questionnaires, and adherence to our CSCP. The comprehensiveness of these evaluations depends upon factors such as the associated supply risk, the criticality of the supplied goods or services, and potential impacts.

In 2025, Odfjell also registered as a supplier of transport services on the Achilles platform as a silver member, further increasing transparency and demonstrating our commitment to accountability across the value chain.

Odfjell annually reports to the EcoVadis platform, achieving a Committed Badge in 2025. This reporting includes comprehensive information on sustainable procurement initiatives, interactions with suppliers, supplier performance in ESG audits, ESG contractual clauses, and related training programmes.

#### **4.7 Odfjell and the Achilles Maritime Network**

Odfjell joined the Achilles Maritime Network in September 2024, a prominent global initiative dedicated to enhancing transparency and promoting responsible practices within maritime supply chains. Achilles is internationally recognized for its expertise in supply chain risk management solutions, offering a robust platform for collaborative compliance, standardized prequalification procedures, and sustainable supply chain management.

During 2025, Odfjell has made significant progress in onboarding suppliers to the Achilles platform. As of the end of 2025, we have 206 of our suppliers registered, with access to a broader network of 1,569 maritime suppliers available for screening and benchmarking.

Suppliers registered through the Achilles Maritime Network are screened across multiple dimensions, including environmental performance, social responsibility, governance practices, and financial stability. In addition, the platform enables screening for exposure and country risk, location-based risk factors, and actions to reduce cyber risk. This comprehensive screening capability strengthens our ability to identify and address potential human rights risks within our supply chain.

No suppliers have been de-listed as a result of Achilles screening to date. Odfjell continues to encourage all suppliers to register on the platform and actively engages with suppliers to promote transparency and continuous improvement. The database continues to evolve, integrating assessments of country risk and human rights risks based on multiple established indices.

It is important to note that while platforms such as Achilles and EcoVadis provide valuable data and screening capabilities, Odfjell retains full ownership of its due diligence process. The findings and data from these platforms are integrated into our own risk assessments and decision-making processes, ensuring that due diligence remains an integral part of our business operations rather than an outsourced function.

## 5. Actual Adverse Impacts on Human and Labor Rights

As a global shipping enterprise operating continuously year-round in diverse and challenging conditions, Odfjell acknowledges that inherent risks related to safety, environmental protection, and human rights are embedded in the nature of our industry. Ensuring safety is therefore fundamental to our operations—it is our highest priority and critical to maintaining our license to operate. We bear an unequivocal responsibility to uphold rigorous safety standards, protect marine ecosystems, and engage positively with communities affected by our activities.

### 5.1 Safety

Throughout 2025, Odfjell maintained its commitment to high standards of health, safety, and security across all global operations. Safety remains our primary focus, and we are committed to providing a safe working environment for every employee.

Our Lost Time Injury Frequency (LTIF) rate for managed shipping operations was 0.71 in 2025. Within our terminal operations, the LTIF rate was 0.26. We uphold the principle that any Lost Time Injury is unacceptable, and we continue to invest in targeted initiatives to analyze incidents, identify root causes, and strengthen risk mitigation processes. Comprehensive safety performance data is available in our Sustainability Statement 2025 – S1-14 Health & safety metrics and in Annual report 2025 under Governance & Impact.

Consistent with our Sustainability Statement 2025, aligned with the European Sustainability Reporting Standards (ESRS), we comprehensively report safety-related performance under both General Disclosures and the Social reporting requirements (S1 Own Workforce).

### 5.2 Geopolitical Context: Red Sea and the Middle East

The ongoing conflict and security threats in the Red Sea region, primarily driven by Houthi militia attacks on commercial shipping, have posed a direct and serious threat to the safety and well-being of seafarers transiting this area. Since the escalation of these attacks, the Red Sea corridor has become one of the most dangerous maritime passages for commercial vessels.

Odfjell has taken a clear position by deciding not to transit the Red Sea during periods of heightened security risk, thereby directly mitigating the threat to our seafarers from armed attack. This decision, while resulting in longer voyage distances and extended time at sea for our crews, reflects our uncompromising commitment to the safety and security of our people. We recognize that extended time at sea can impact crew welfare and have taken measures to monitor and support the psychological well-being of our seafarers.

The broader geopolitical situation in the Middle East continues to present challenges for the maritime industry into 2026, and we remain vigilant in monitoring developments that may affect the safety and rights of our workforce. We continue to engage with industry bodies and security organizations to ensure our risk assessments remain current and our mitigation measures effective.

### 5.3 Environment

In July 2022, the United Nations General Assembly formally recognized access to a clean and healthy environment as a universal human right. Odfjell acknowledges that our business operations can impact environmental conditions, and we proactively strive to decarbonize our activities and minimize negative impacts on climate, ecosystems, and ocean health.

In 2025, we continued our sustained efforts to enhance energy efficiency and reduce emissions. We comprehensively report environment-related performance in our Sustainability Statement 2025 – E1 Climate Change and E2 Pollution. Notably, our 2025 ESRS reporting now includes E4 Biodiversity, reflecting our expanded commitment to addressing nature-related impacts.

Our commitment to sustainability and climate action was further strengthened through the establishment of new, more ambitious targets aimed at achieving additional reductions in carbon intensity, reinforcing our long-term objective of reaching net-zero emissions.

## 6. Most Significant Risk of Negative Consequences for Human and Labor Rights

Our impact assessment identified 19 risk and impact categories. These categories do not represent traditional business risks, but rather areas where our operations may potentially have adverse effects on human rights. Based on this analysis, we have identified the following key areas where our business activities may significantly impact human and labor rights:

Risk / Potential Impact	Mitigating Actions
<b>HRIA1</b> Environmental impact on local areas (e.g., pollution, emissions)	Integration of climate risk mitigation into corporate strategy. Climate targets and transition plans established. Environmental Policy implemented. Active participation in climate initiatives. Emergency and contingency planning. Competent and qualified personnel at all levels.
<b>HRIA5</b> Poor safety and health conditions for workers engaged through external ship managers, shipyards, and ports	Enforcement of Corporate Supplier Conduct Principles. Inclusion of human and labor rights requirements in contracts. Development of sustainable procurement programme including supplier screening via Achilles Maritime Network. On-site audits and inspections at shipyards.
<b>HRIA11</b> Inadequate work environment and labor rights for workers at external ship managers, shipyards, and ports	Corporate Supplier Conduct Principles in contractual agreements. Inclusion of human and labor rights requirements in contracts. Ongoing development of sustainable procurement programme. Active engagement through Achilles platform screening. Health programs in place e.g. mental health initiatives and program, Seafarers wellbeing program
<b>HRIA3</b> Safety and health of employees – Exposure to hazardous cargo	“Safety First” philosophy embedded in company culture. Comprehensive safety training programmes. Robust safety policies and operational procedures. Continuous monitoring and improvement of safety performance. Fit for purpose equipment, procedures and personal protection equipment (PPE).
<b>HRIA6+8</b> Risk of forced labor and child labour at shipyards and ports	Same measures as outlined under HRIA5, with a focus on supplier screening and responsible recruitment practices. Enhanced due diligence at ship recycling yards in India. Human Rights policy in place.

<b>HRIA4 (New)</b> Right to a psychologically safe working environment free from harassment	Buddy system for female seafarers. Policy to ensure that no female cadet or trainee shall serve as single female on any vessel. Anti-harassment training and awareness campaigns. Strengthened anonymous reporting channels. Active investigation and follow-up of all reported incidents.
<b>HRIA2 (New)</b> Seafarer safety in conflict zones and areas of geopolitical instability	Armed guards onboard. Security and contingency plans. War risk insurance. Decision not to transit high-risk areas (Red Sea). Continuous monitoring of geopolitical developments. Enhanced security protocols. Crew welfare support during extended voyages. Engagement with industry security organizations.

We score and evaluate these impact areas in the HRIA matrix, assessing connection, leverage, severity, likelihood, priority, and mitigation for each impact area. The risks are prioritized according to their severity and our connection and leverage to each risk.

We evaluate the locations of our operations, including countries where we have offices, build and maintain our vessels, call ports, and recycle vessels. From our HRIA, we have identified that our operations can impact human rights most significantly in relation to shipyards in regions that score low on various Human Rights indices. These include shipbuilding, maintenance and dry-docking, and recycling at shipyards, as well as work from sub-suppliers to the yards.

## 6.1 Ship Recycling in India

In 2025, Odfjell increased its presence in the ship recycling sector through activities at yards in Alang, India. We completed the recycling of the vessel Bow Clipper at the Priya Blue yard, and as of the date of this report, three additional vessels are under recycling at the Alang Auto V9 facility.

Odfjell applies rigorous due diligence to all ship recycling activities. We ensure that all yards we engage operate in full compliance with applicable regulations, including the Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships, relevant ILO conventions on occupational health and safety, and the EU Ship Recycling Regulation. All relevant requirements under the UN Guiding Principles on Business and Human Rights are incorporated into our contractual arrangements and form the basis for our audits and reviews.

Odfjell maintains a continuous presence at the yards through our own supervisory personnel, conducting inspections and monitoring compliance with safety and working condition standards. To date, we have not observed any accidents or areas where our activity has had a negative impact on the rights or well-being of workers at these facilities. On the contrary, our experience indicates that the presence of responsible shipowners at the highest-quality yards contributes positively to yard development, making these facilities more attractive to workers and driving improved standards in safety, health, and worker well-being.

## 6.2 Harassment and the Right to a Psychologically Safe Working Environment

Ensuring a psychologically safe working environment, free from harassment of any kind, is a strategic priority for Odfjell. All employees have a fundamental right to a physically and psychologically safe workplace, and ensuring this safety is a reflection of our values and our long-term commitment to building a strong, inclusive, and respectful culture.

As with any global organization, Odfjell acknowledges that we are not immune to incidents where individuals act in violation of our Code of Conduct. In 2025, we received one report of harassment onboard a vessel. This case is currently under investigation. Such incidents are deeply concerning and are addressed with the utmost seriousness. We do not tolerate harassment or sexual harassment in any form.

We also acknowledge that as we strive to increase the representation of women in our seafaring workforce, there is an associated risk of heightened exposure to sexual harassment or unwanted attention. While gender diversity at sea is a strategic priority for Odfjell, it comes with a clear responsibility to ensure that every seafarer—regardless of gender—feels safe, respected, and supported in their working environment.

To address this, Odfjell has implemented and continues to strengthen multiple targeted measures:

- **Buddy system:** We have introduced a buddy system for female seafarers onboard our vessels, providing peer support and an additional layer of safety.
- **Crew composition policy:** We are increasing the percentage of female crew members onboard and have adopted a policy to ensure that no female cadet or trainee shall serve as single female on any vessel.
- **Training and awareness:** Anti-harassment training programs and multiple awareness campaigns have been deployed across the fleet and onshore operations.
- **Reporting channels:** We maintain robust anonymous reporting systems to ensure that all employees can raise concerns safely and without fear of retaliation.
- **Active investigation and follow-up:** All reported cases are investigated thoroughly with appropriate consequences for substantiated violations.

While we do not categorize individual cases of harassment as systemic human rights violations under international definitions, unless systematic weaknesses in our policies, procedures, or practices are identified, they are nevertheless treated with the highest level of concern and follow-up. Odfjell will continue to strengthen its efforts in this area, fostering a work environment where ethical conduct is the norm and where every individual feels safe and empowered to speak up.

## 7. Measures to Mitigate Risk or Restore Actual Consequences

### 7.1 Training and Competence

Training and competence are fundamental to Odfjell’s commitment to human rights, compliance, and safety performance. Well-informed and capable personnel are critical to identifying, preventing, and addressing potential human rights risks, ensuring compliance with regulations, and maintaining safety across all operations.

Safety training remains a priority, aligning fully with international standards such as the STCW and IMO regulations. We continuously invest in rigorous training and skill verification to ensure the highest standards of safety and operational competence. We have run online training programs on human rights. All employees have affirmed their commitment by signing our Corporate Human

Rights Policy as part of a campaign in 2023. This is a part of training process where material policies are included in training programs in different years. We intend to include Human Rights in our training plan in 2027.

Through initiatives like FuturePROOF and our collaboration with the Rafto Foundation and the Institute for Human Rights, we actively engage with industry and human rights experts, enhancing our organizational capacity, exchanging best practices, and contributing to collective efforts for improvement.

## 7.2 Measures Regarding Safety and Health of Employees

We continually review personal protective equipment to ensure we provide the best equipment for our employees to perform their tasks safely. We strive to ensure our employees do things the right way, and only the right way. We continuously develop and monitor our safety training and do not compromise on safety. For all operations, we conduct safety hazard identification and safety risk assessment to ensure that all identified risks are mitigated, safeguarding both our people and the environment.

## 7.3 Measures Regarding Environmental Impact

Since 2007, Odfjell has been at the forefront of energy efficiency and emissions reduction. Our dedicated departments employ both operational and technical strategies to achieve our goals. We continuously work to reduce our environmental impact, especially reduction of greenhouse gases (GHG) and to mitigate the risk of pollution. We have reported our climate risk, impact, and opportunities in our Sustainability Statement 2025 – E1 Climate change.

## 7.4 Measures Regarding Workers in the Value Chain

To mitigate the risk of negative impact in the high-impact areas related to shipyards and ship recycling facilities, we conduct a thorough due diligence process on all yards we plan to use. We have a clear selection, audit, and follow-up process, and we are always present with our own supervisors at the yards during maintenance and recycling operations. We continue to develop and improve the human rights elements of these due diligence processes, informed by the recommendations received from the Rafto Foundation's review of our HRIA.

Through the Achilles Maritime Network, we have expanded our capability to screen and monitor suppliers across environmental, social, governance, financial, and location-based risk dimensions. This systematic approach, combined with our own direct due diligence activities, strengthens our ability to identify and address risks of forced labor, child labour, and inadequate working conditions in our supply chain.

## 7.5 Measures Regarding Diversity, Equity, and Inclusion

Diversity goes beyond gender, age, and nationality. It encompasses ethnicity, experience, educational background, competence, culture, perspective, sexual orientation, religion, and disability. It is also about different perspectives and the diversity of thought. Inclusion puts diversity into action by creating an environment of belonging, respect, and connection.

As we develop and renew our workforce, we see greater collaboration between managers and recruiters to increase the diversity of our talent pool. We strive to foster an organization that values diversity, equity, and collaboration, and a working environment where employees are valued for their uniqueness and can contribute fully. We have made several specific changes to our recruitment processes to drive improved gender balance at sea and onshore.

Diversity and inclusion remain integral to our corporate culture, prompting ongoing initiatives to improve gender balance within our workforce. Despite the challenges inherent to our industry, we are making progress towards our goal of a minimum 30% gender balance for the onshore shipping organization by 2030. Comprehensive diversity and social data are available in our Sustainability Statement 2025 – S1 Own workforce.

## 8. Contact Information

If you have any questions related to our work on human rights, or wish to submit an information request pursuant to Section 7 of the Norwegian Transparency Act, please contact us at: [oistein.jensen@odjell.com](mailto:oistein.jensen@odjell.com).

This report is published on the Odjell SE website and is referenced in the annual reports of the covered entities. Previous years' reports remain available on our website to enable stakeholders to follow the progression of our due diligence work.

**Bergen, 6 May 2026**

*The document on file is signed by the CEO, Chair and members of the board of directors of the following companies on 6. May 2026.*

**Odjell SE**

**Odjell Tankers AS**

**Odjell Management AS**

**Odjell Chemical Tankers AS**